MEMO

To: Cindy Darling, CALFED

From: . California Department of Food and Agriculture

Subject: Comments on the document entitled "Implementation Strategy and Priorities for Bay Delta Ecosystem Restoration" Dated January 9, 1997.

Date: January 24, 1997

This is in response to your request at the January 21, 1997 Ecosystem Roundtable meeting, for written input on the subject document by the end of this week.

COMMENTS:

1. There should be an integrated ecosystem monitoring program, in order to determine the consequences of implementation actions. This should be developed as part of the implementation strategy, since it will be essential to have feedback for the adaptive management of the ecosystem restoration program. While much data already exists, and many agencies and researchers have ongoing monitoring programs, there is no central coordination of these efforts. Especially, the needs for any additional baseline data should be identified now, before any restoration projects are implemented. It is essential to be able to identify the consequences of the ecosystem restoration actions (See criteria number 3 on page 9 of the January 9, 1997 document.)

There are many interacting factors which will continue to impact the species and ecosystems of the Delta, beyond the implementation actions of the ecosystem restoration program. For example, with the recent high flows down the Feather River, and the failure to take action to eradicate when it was still feasible, it appears very likely that the exotic fish, northern pike is now a member of the Delta and tributary streams ecosystems. If so, this species will probably replace stripped bass as the top predator of the system. All of the species on pages 5 and 6 will be in the prey base of this voracious predator. Some of the ecosystem restoration habitats (for example shallow water habitats adjoining deeper water) may actually provide ideal habitats for northern pike and accentuate the adverse impact on identified key species. Implementation actions may well have positive effects on key species, and yet there may be population declines or even extinctions due to other factors, such as northern pike, which cannot be effectively controlled.

2. Actions which would increase the volume of the tidal prism of the Delta have the potential to adversely impact salinity (for example "Tidal perennial aquatic habitat" on page 2, and "Saline emergent wetlands" on page 4.) The actions which would increase the area of tidal influence need to be evaluated for cumulative impacts on Delta water quality. Existing models used to predict

Delta flows are unlikely to easily provide this analysis since they are predicated on a fixed physical configuration of the Delta.

3. Table 3, "Draft Criteria for Selection of Restoration Actions" has a number of general guidelines. These will apparently be developed into specific ranking and screening criteria, which some entity will then apply to specific actions. This process needs to be defined. In addition there needs to be a process for review of the selection, ranking, and phasing of restoration actions, and to resolve conflicts.

There is large potential for disagreement over the application of the criteria in Table 3. For example, I would say that any implementation action which would result in conversion of farmland to another use, without specific measures to offset the lost productivity, would be contrary to Criteria 1, 2, and 5, and thus should not be considered for early funding. I would expect some other participants to disagree with me. These general criteria need to be refined and developed into unambiguous and readily applicable standards. Proposed implementation actions which do not meet these standards may still have merit, but will need to be considered in the EIR/EIS before CALFED decides whether or not to implement them.

4. Table 3, "Draft Criteria for Selection of Restoration Actions." An additional criteria should be added: "Short term ecosystem restoration actions should not have unmitigated significant adverse impacts on the environment."